

DUANE MORRIS LLP
Anthony J. Costantini
Suzan Jo
Kevin P. Potere
1540 Broadway
New York, New York 10036
Telephone: 212-692-1000
Facsimile: 212-692-1020

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALLEN APPLESTEIN, et al.,

Plaintiffs,
-against-
REPUBLIC OF ARGENTINA,

Defendant.

Civil Action No. 02-CV-04124 (TPG)

**NOTICE OF MOTION
FOR TURNOVER ORDER
AGAINST BANK OF NEW YORK
MELLON**

APPLESTEIN,

Plaintiff,
-against-
ARGENTINA REPUBLIC, et al.,

Defendants.

Civil Action No. 02-CV-01773 (TPG)

FRANCESCHI, et al.,

Plaintiffs,
-against-
REP. OF ARGENTINA,

Defendant.

Civil Action No. 03-CV-04693 (TPG)

MAZZINI, et al., Plaintiffs, -against- THE REPUBLIC OF ARGENTINA, Defendant.	Civil Action No. 03-CV-08120 (TPG)
MORATA, et al., Plaintiffs, -against- THE REPUBLIC OF ARGENTINA, Defendant.	Civil Action No. 04-CV-03314 (TPG)
MODES, et al., Plaintiffs, -against- THE REPUBLIC OF ARGENTINA, et al. Defendants.	Civil Action No. 04-CV-06137 (TPG)
MARIA FAUSTA CILLI, et al., Plaintiffs, -against- THE REPUBLIC OF ARGENTINA, Defendant.	Civil Action No. 04-CV-06594 (TPG)
ROSA, et al., Plaintiffs, -against- THE REPUBLIC OF ARGENTINA, Defendant.	Civil Action No. 04-CV-07504 (TPG)

<p>CONSOLINI, et al.,</p> <p>Plaintiffs,</p> <p>-against-</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-00177 (TPG)
<p>FERRI, et al.,</p> <p>Plaintiffs,</p> <p>-against-</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-02943 (TPG)
<p>RIGUEIRO, et al.,</p> <p>Plaintiffs,</p> <p>-against-</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-03089 (TPG)
<p>BETTONI, et al.,</p> <p>Plaintiffs,</p> <p>-against-</p> <p>THE REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-04299 (TPG)
<p>FEDECOSTANTE, et al.,</p> <p>Plaintiffs,</p> <p>-against-</p> <p>REPUBLIC OF ARGENTINA,</p> <p>Defendant.</p>	Civil Action No. 05-CV-04466 (TPG)

<p>LISI, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>-against-</p> <p>REPUBLIC OF ARGENTINA,</p> <p style="text-align: center;">Defendant.</p>	Civil Action No. 05-CV-06002 (TPG)
<p>ROSSINI, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>-against-</p> <p>REPUBLIC OF ARGENTINA, et al.</p> <p style="text-align: center;">Defendants.</p>	Civil Action No. 05-CV-06200 (TPG)
<p>KLEIN, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>-against-</p> <p>REPUBLIC OF ARGENTINA,</p> <p style="text-align: center;">Defendant.</p>	Civil Action No. 05-CV-06599 (TPG)
<p>LOVATI,</p> <p style="text-align: center;">Plaintiff,</p> <p>-against-</p> <p>REPUBLIC OF ARGENTINA,</p> <p style="text-align: center;">Defendant.</p>	Civil Action No. 05-CV-08195 (TPG)
<p>BOTTI, et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>-against-</p> <p>THE REPUBLIC OF ARGENTINA, et al.,</p> <p style="text-align: center;">Defendants.</p>	Civil Action No. 05-CV-08687 (TPG)

PASQUALI,

Plaintiff,

-against-

REPUBLIC OF ARGENTINA,

Defendant.

Civil Action No. 05-CV-10636 (TPG)

BEYER, et al.,

Plaintiffs,

-against-

REPUBLIC OF ARGENTINA,

Defendant.

Civil Action No. 07-CV-00098 (TPG)

BORGRA, et al.,

Plaintiffs,

-against-

REPUBLIC OF ARGENTINA,

Defendant.

Civil Action No. 07-CV-05807 (TPG)

PLEASE TAKE NOTICE that, upon the Declaration of Anthony J. Costantini dated August 7, 2014, and the exhibits annexed thereto, and upon Plaintiffs' Memorandum of Law in Support of Motion for Turnover Order Against Bank of New York Mellon, plaintiffs in the above-captioned actions ("Plaintiffs"), by and through undersigned counsel, will and hereby do move this Court before the Honorable Thomas P. Griesa, United States District Judge, U.S. District Court for the Southern District of New York, Courtroom 26B, 500 Pearl Street, New York, NY 10007, pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and Section 5225(b) of the New York Civil Practice Law and Rules, as set forth more fully in the accompanying memorandum of law, for an Order directing Bank of New York Mellon to turn

over the \$539 Million held in its possession on behalf of the Republic of Argentina, or so much of it as is sufficient to satisfy Plaintiffs' judgments.

Dated: New York, New York
August 7, 2014

DUANE MORRIS LLP

/s/ Anthony J. Costantini
Anthony J. Costantini
E-mail: ajcostantini@duanemorris.com
Suzan Jo
E-mail: sjo@duanemorris.com
Kevin P. Potere
Email: kppotere@duanemorris.com
1540 Broadway
New York, NY 10036
Telephone: 212-692-1000
Facsimile: 212-692-1020

Attorneys for Plaintiffs